

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Sean Pak (Bar No. 219032)
seanpak@quinnemanuel.com
Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
James Judah (Bar No. 257112)
jamesjudah@quinnemanuel.com
Lindsay Cooper (Bar No. 287125)
lindsaycooper@quinnemanuel.com
Iman Lordgooei (Bar No. 251320)
imanlordgooei@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Marc Kaplan (*pro hac vice*)
marckaplan@quinnmanuel.com
191 N. Wacker Drive, Ste 2700
Chicago, Illinois 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SONOS, INC.,
Plaintiff,
vs.
GOOGLE LLC,
Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. 631)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
 7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. 631)
 8 filed in connection with Sonos’s Supplemental Brief Regarding ’885 and ’966 Patents (“Supplemental
 9 Brief”) (Dkt. 632). If called as a witness, I could and would testify competently to the information
 10 contained herein.

11 3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Sonos’s Supplemental Brief	Portions highlighted in green	Portions outlined in red boxes	Google
Exhibit 2 to the Declaration of Joseph Kolker in Support of Supplemental Brief (“Exhibit 2”)	Entire document	Entire document	Google
Exhibit 3 to the Declaration of Joseph Kolker in Support of Supplemental Brief (“Exhibit 3”)	Entire document	Portions outlined in red boxes	Google
Exhibit 4 to the Declaration of Joseph Kolker in Support of Supplemental Brief (“Exhibit 4”)	Entire document	Portions outlined in red boxes	Google
Exhibit 6 to the Declaration of Joseph Kolker in Support of Supplemental Brief (“Exhibit 6”)	Entire document	None	Google

4. I understand that a “particularized showing of ‘good cause’ under Federal Rule of Civil Procedure 26(c) . . . suffices to warrant sealing in connection with a non-dispositive motion” such as Sonos’s Supplemental Brief. *Bronson v. Samsung Elecs. Am., Inc.*, No. C 18-02300 WHA, 2019 WL 7810811, at *1 (N.D. Cal. May 28, 2019).

5. The portions outlined in red boxes contain references to Google's confidential business
information and trade secrets, including source code and details regarding the architecture and
technical operation of Google's products. The specifics of how these functionalities operate is
confidential information that Google does not share publicly. Thus, I understand that the public
disclosure of such information could lead to competitive harm to Google, as competitors could use
these details regarding the architecture and functionality of Google's products to gain a competitive
advantage in the marketplace with respect to their competing products. Google has therefore
designated this information as HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY under the
protective order (Dkt. No. 92). I also understand that this Court has previously granted sealing of the
same and/or similar information. *See, e.g.*, Dkt. 334 at 3.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct. Executed on May 8, 2023, in San Francisco, California.

18 | DATED: May 8, 2023

By: /s/ Jocelyn Ma
Jocelyn Ma